| 1 | MICHELE BECKWITH | | |
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| 2 | Acting United States Attorney KEVIN C. KHASIGIAN Assistant U. S. Attorney 501 I Street, Suite 10-100 | | |
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| 4 | Sacramento, CA 95814 Telephone: (916) 554-2700 | | |
| 5 | Attorneys for the United States | | |
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| 8 | IN THE UNITED STATES DISTRICT COURT | | |
| 9 | EASTERN DISTRICT OF CALIFORNIA | | |
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| 11 | UNITED STATES OF AMERICA, | 2:24-MC-00402-DJC-SCR | |
| 12 | Plaintiff, | CTIDILI ATION AND ODDED EVENDING | |
| 13 | v. | STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR | |
| 14 | APPROXIMATELY \$269,565.50 SEIZED FROM | FORFEITURE AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE | |
| 15 | FIRST RELIANCE BANCSHARES, INC. ACCOUNT NUMBER 5220000969, HELD IN THE NAME OF LIFESTYLE DEVELOPMENT, LLC, | | |
| 16 | APPROXIMATELY \$1,373.95 SEIZED FROM | | |
| 17 18 | VALLEY NATIONAL BANK ACCOUNT NUMBER 8843534202, HELD IN THE NAME OF LIFESTYLE DEVELOPMENT, LLC, | | |
| 19 | , , | | |
| 20 | APPROXIMATELY \$7,982.56 SEIZED FROM FIRST RELIANCE BANCSHARES, INC. | | |
| 20 | ACCOUNT NUMBER 5210000745, HELD IN THE NAME OF THOMAS EIDE, | | |
| 21 | APPROXIMATELY \$50,000.00 SEIZED FROM MAINSTREET BANK ACCOUNT NUMBER | | |
| 23 | 2010039009, HELD IN THE NAME OF PRV INTERNATIONAL, LLC, | | |
| 24 | APPROXIMATELY \$36,650.38 SEIZED FROM | | |
| 25 | BANK OF AMERICA, N.A. ACCOUNT NUMBER 383019458700, HELD IN THE NAME OF | | |
| 26 | VITAKEM NUTRA, AND | | |
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APPROXIMATELY \$37,886.31 SEIZED FROM SOUTHSTATE BANK, NA ACCOUNT NUMBER 8010002012630, HELD IN THE NAME OF SARAH NICK,

Defendants.

It is hereby stipulated by and between the United States of America and potential claimants. Thomas Eide on behalf of himself and Lifestyle Development, LLC, by and through their respective counsel, and Erick Reyes-Villa as representative for PRV International, LLC ("claimants"), as follows:

- 1. On or about May 7, 2024, the U.S. Postal Inspection Service ("USPIS") seized the above-referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively "defendant funds").
- 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was October 4, 2024.
- 3. By Stipulation and Order filed October 9, 2024, the parties stipulated to extend to January 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.
- 4. By Stipulation and Order filed January 6, 2025, the parties stipulated to extend to April 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.
- 5. By Stipulation and Order filed April 7, 2025, the parties stipulated to extend to July 1, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.
- 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to September 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to

| 1 | forfeiture. | |
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| 2 | 7. Accordingly, the parties agree that the deadline by which the United States shall be | |
| 3 | required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment | |
| 4 | alleging that the defendant funds are subject to forfeiture shall be extended to September 29, 2025. | |
| 5 | Dated: <u>6/27/2025</u> | MICHELE BECKWITH Acting United States Attorney |
| 6 | | Acting Office States Attorney |
| 7 | By: | /s/ Kevin C. Khasigian KEVIN C. KHASIGIAN |
| 8 | | Assistant U.S. Attorney |
| 10 | Dated: <u>6/26/2025</u> | /s/ Daniel Olmos |
| 11 | | DANIEL OLMOS Attorney for potential claimant Thomas Eide on |
| 12 | | behalf of himself and Lifestyle Development, LLC 600 University Avenue |
| 13 | | Palo Alto, CA 94301 (Signature authorized by email) |
| 14 | | |
| 15 | Dated: <u>6/27/2025</u> | /s/ Erick Reyes-Villa ERICK REYES-VILLA |
| 16 | | Potential Claimant on behalf of PRV International, LLC |
| 17 18 | | Appearing <i>in propria persona</i> 1055 Thomas Jefferson Street NW, Suite 620 |
| 19 | | Washington, DC 20007 (Signature authorized by email) |
| 20 | | |
| 21 | IT IS SO ORDERED. | |
| 22 | | |
| 23 | Dated: June 30, 2025 | /s/ Daniel J. Calabretta |
| 24 | | THE HONORABLE DANIEL J. CALABRETTA UNITED STATES DISTRICT JUDGE |
| 25 | | GIAILD STAILS DISTRICT JUDGE |
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